From: Zhen.Davis@epamail.epa.gov

To: Wong.Herman@epamail.epa.gov

Date: 1/31/2013 4:13:01 PM

Subject: Re: Fw: Prevention of Significant Deterioration Air Quality Reviews

Mark,

Herman is correct that ADEC's PSD program is SIP approved. In that, unless their permits get challenged and the State or the litigant requests EPA review, we do not conduct reviews on those project.

Thanks,

\*\*\*\*\*\*\*\*\*\*

Davis Zhen
Federal and Delegated Air Programs
1200 Sixth Avenue Suite 900
M/S AWT - 107
Seattle, WA 98101
Tel: (206) 553-7660
Fax: (206) 553-0110

\*\*\*\*\*\*\*\*\*\*\*

Herman Wong---01/31/2013 02:55:51 PM---Correction. It is not delegated but SIP approved. The most significant difference is that for SIP

From: Herman Wong/R10/USEPA/US To: Mark Jen/R10/USEPA/US@EPA

Cc: Davis Zhen/R10/USEPA/US@EPA, Mahbubul Islam/R10/USEPA/US@EPA

Date: 01/31/2013 02:55 PM

Subject: Re: Fw: Prevention of Significant Deterioration Air Quality Reviews

Correction. It is not delegated but SIP approved. The most significant difference is that for SIP approved programs (i.e. PSD), EPA does not co-sign

Mark Jen---01/31/2013 01:36:21 PM---Hi Herman, Thanks for the update. I was under the assumption that EPA would need to conduct a PSD r

From: Mark Jen/R10/USEPA/US

To: Herman Wong/R10/USEPA/US@EPA,

Cc: Davis Zhen/R10/USEPA/US@EPA, Mahbubul Islam/R10/USEPA/US@EPA

Date: 01/31/2013 01:36 PM

Subject: Re: Fw: Prevention of Significant Deterioration Air Quality Reviews

Hi Herman,

Thanks for the update. I was under the assumption that EPA would need to conduct a PSD review as part of our oversight responsibilities of ADEC's air program. I was not certain who is responsible for doing this work for EPA, if needed.

Mark S. Jen | Environmental Scientist | U.S. Environmental Protection Agency | Region 10 | | Alaska Operations Office | 222 W Seventh Avenue #19 | Room 537 | | Anchorage, Alaska 99513-7588 | | Office: 907-271-3411 | Cell: 907-602-8495 | Fax: 907-271-3424 | | E-mail: jen.mark@epa.gov | Herman Wong---01/31/2013 12:08:45 PM---Mark: The PSD program has been delegated to AK DEC. Hence, the only reason I would be involved with

From: Herman Wong/R10/USEPA/US To: Mark Jen/R10/USEPA/US@EPA

Cc: Davis Zhen/R10/USEPA/US@EPA, Mahbubul Islam/R10/USEPA/US@EPA

Date: 01/31/2013 12:08 PM

Subject: Re: Fw: Prevention of Significant Deterioration Air Quality Reviews

## Mark:

The PSD program has been delegated to AK DEC. Hence, the only reason I would be involved with the review of the PSD permit application is if Alan Schuler requested my assistance and if Donlin uses an unapproved modeling technique that requires R10 (my) approval. Alan and I have been communicating when necessary for several years.

Nevertheless, it is in our best interest to work with AK DEC to insure that for common technical areas in the NEPA document and PSD permit application, we are using the same assumptions, data, information and models. This would include:

- 1. Preconstruction air quality monitoring data for background
- 2. Preconstruction meteorological monitoring data for modeling
- 3. Emission Inventories
- 4. Ambient air definition
- 5. Predicted concentrations

(Note: Predicted concentrations could be different if the PSD application is submitted after the final NEPA document and Donlin obtains more refined and better engineering information for the modeling analysis.)

We will diverge in terms of requiring more analyses because NEPA is full disclosure while the PSD regulations require specific information in the application.

For engineering support, I already asked Zach Hedgpeth several months ago. Zach also works in OEA.

Herman Wong Regional Atmospheric Scientist/Modeling Contact USEPA Region 10 Office of Environmental Assessment (OEA-095) 1200 Sixth Ave, Suite 900 Seattle, WA 98101-1128 206.553.4858

Email: wong.herman@epa.gov

Mark Jen---01/31/2013 11:54:05 AM---Hi Herman, Since you have been working with ADEC and Donlin on the Air modelling issues, are you als

From: Mark Jen/R10/USEPA/US

To: Herman Wong/R10/USEPA/US@EPA, Cc: Davis Zhen/R10/USEPA/US@EPA

Date: 01/31/2013 11:54 AM

Subject: Fw: Prevention of Significant Deterioration Air Quality Reviews

Hi Herman,

Since you have been working with ADEC and Donlin on the Air, modelling issues, are you also involved with the PSD review? Thanks.

Mark S. Jen | Environmental Scientist | U.S. Environmental Protection Agency | Region 10 | | Alaska Operations Office | 222 W Seventh Avenue #19 | Room 537 | | Anchorage, Alaska 99513-7588 | | Office: 907-271-3411 | Cell: 907-602-8495 | Fax: 907-271-3424 | | E-mail: jen.mark@epa.gov |

---- Forwarded by Mark Jen/R10/USEPA/US on 01/31/2013 10:53 AM -----

From: Davis Zhen/R10/USEPA/US To: Mark Jen/R10/USEPA/US@EPA Date: 01/31/2013 10:48 AM

Subject: Re: Prevention of Significant Deterioration Air Quality Reviews

Mark,

I checked with my permit writers, neither have been contacted by Donlin nor ADEC for PSD reviews.

Thanks,

\*\*\*\*\*\*\*\*\*\*\*

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Mark Jen---01/30/2013 01:54:05 PM---Hi Davis, Just to follow up, has anyone from your staff been contacted by Donlin Gold LLC or ADEC to

From: Mark Jen/R10/USEPA/US To: Davis Zhen/R10/USEPA/US@EPA

Date: 01/30/2013 01:54 PM

Subject: Re: Prevention of Significant Deterioration Air Quality Reviews

Hi Davis,

Just to follow up, has anyone from your staff been contacted by Donlin Gold LLC or ADEC to conduct a PSD review for the Donlin Gold Project in Alaska? Thanks

Mark S. Jen | Environmental Scientist | U.S. Environmental Protection Agency | Region 10 | | Alaska Operations Office | 222 W Seventh Avenue #19 | Room 537 | | Anchorage, Alaska 99513-7588 | | Office: 907-271-3411 | Cell: 907-602-8495 | Fax: 907-271-3424 | | E-mail: jen.mark@epa.gov |

Davis Zhen---01/11/2013 01:09:14 PM---Hi Mark, My unit does the PSD reviews, I will check with my permit writers to see whether we have c

From: Davis Zhen/R10/USEPA/US To: Mark Jen/R10/USEPA/US@EPA

## Hi Mark,

My unit does the PSD reviews, I will check with my permit writers to see whether we have capacity to conduct a review. We are quite short handed here.

Thanks,

\*\*\*\*\*\*\*\*\*\*\*

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Fax: (206) 553-0110

Mark Jen---01/11/2013 01:52:59 PM---Hi Davis, I am coordination the Donlin Gold Project EIS in Alaska. I wanted to clarify with you whe

From: Mark Jen/R10/USEPA/US
To: Davis Zhen/R10/USEPA/US@EPA

Date: 01/11/2013 01:52 PM

Subject: Prevention of Significant Deterioration Air Quality Reviews

## Hi Davis,

I am coordination the Donlin Gold Project EIS in Alaska. I wanted to clarify with you whether your unit is responsible for conducting PSD Air Quality Reviews for the ADEC permit on this project?

Can you let me know who the reviewer is for this project? Thank you.

Mark S. Jen | Environmental Scientist | U.S. Environmental Protection Agency | Region 10 | | Alaska Operations Office | 222 W Seventh Avenue #19 | Room 537 | | Anchorage, Alaska 99513-7588 | | Office: 907-271-3411 | Cell: 907-602-8495 | Fax: 907-271-3424 | | E-mail: jen.mark@epa.gov |